



September 6, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
(617) 918-1102

**Re: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 and 42 U.S.C. Section 9604(e)(7)(A),<sup>1</sup> I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Isochem / Paragon in Lincoln, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

Please note that at certain periods Isochem and Paragon at the Lincoln site were known by various names or referred to by their parent companies, some of which are listed below. Additional names may include Isochem Resins Company, Isochem Corp., Paragon Chemical Company, or BASF Corp.

**RCRA Requested Documents**

We understand that hazardous waste generated by Furane Products / Isochem Operations at 99 Cook Street, Lincoln, Rhode Island was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID001192566.

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<sup>1</sup> The relevant statutory text provides that: "Any records, reports, or information obtained from any person under this section (including records, reports, or information obtained by representatives of the President) shall be available to the public, [except for trade secrecy claims]. Trade secrecy claims are restricted by section 104(e)(7)(F).

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Inspections and correspondence for the period 1984 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985
- RCRA Part B Application
- Correspondence concerning corrective action obligations at this site

#### TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Furane Products / Isochem at 99 Cook Street, Lincoln, Rhode Island identified certain chemicals used at these sites. We therefore request the following documents related to this facility produced as required by TSCA:

- 1986 Reporting Year Data
- 1990 Reporting Year Data

#### TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated Furane Products / Isochem at 99 Cook Street, Lincoln, Rhode Island. We therefore request the following documents related to PCBs and this installation:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties.

#### AIR Requested Documents

We understand that Furane Products / Isochem at 99 Cook Street, Lincoln, Rhode Island operated under the regulation of the Clean Air Act. We therefore request the following documents related to this facility:

- Earliest air permit registration and application documents (if present)
- Inspection files
- Correspondence for the earliest period possible

#### NPDES Requested Documents

We understand that under the Clean Water Act, installations discharging waste to surface waters are required to obtain a permit and register with the National Pollutant Discharge Elimination System. For Furane Products / Isochem Operations at 99 Cook Street, Lincoln, Rhode Island we therefore request the following documents:

- Earliest NPDES registration and permit applications

- Inspection and correspondence files

*Superfund Enterprise Management System*

We understand that, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Lonsdale Bleachery at Carrington Street, Lincoln, Rhode Island was identified as a possible Superfund site and was assigned the following facility ID: RIN000103681. We therefore request the following documents related to these facilities produced as required under CERCLA:

- Work plans and closure documentation focusing on processes causing contamination and chemical releases

Additionally, if Paragon/ Isochem are identified as possible sources of contamination at this site, we request documents that identify chemical processes, raw materials, and waste.

*Emergency Response Notification System*

We understand that releases of hazardous substances at the Former Lonsdale Bleachery at Carrington Street, Lincoln, Rhode Island were reported to the National Response Center and documented in the Emergency Response Notification System with the following database ID: 730158. We therefore request the following documents related to these facilities produced as required under CERCLA:

- Spill reports focusing on entities causing contamination

Additionally, if Paragon/ Isochem are identified as possible sources of contamination at this site, we request documents that indicate a chemical source or process information.

*Request Information*

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at [HBergen@historyassociates.com](mailto:HBergen@historyassociates.com).

Sincerely,  
Hilary Bergen